



JACOBS P.C.
NEW YORK BUSINESS ATTORNEYS

March 30, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Denis R. Hurley, U.S.D.J.
100 Federal Plaza
Central Islip, NY 11172-4438

Re: SHHA LLC v. Opal Holdings LLC, *et al.*
Case No.: 2:20-cv-3574 (DRH) (AYS)

Dear Judge Hurley:

This office represents the Plaintiff, SHHA LLC. Plaintiff writes to respectfully request a one (1) week extension of time to submit opposition to Defendants' Opal Holdings LLC, Opal Holdings NY LLC, and Shaya Prager (the "Prager Defendants") as well as Chaim Holman and Holman Funding LLC's (the "Holman Defendants") separate motions to dismiss¹.

Pursuant to ¶ 2(E) of this Court's Individual Practice Rules, Plaintiff respectfully submits that: (i) the original deadline to oppose the motions to dismiss was Friday, April 2, 2020; (ii-iii) there has been one (1) previous request for an extension of time to respond to oppose the motions and it was granted on consent; (iv) consent has not yet been obtained from all adversaries as all have not yet responded; and (v) Plaintiff respectfully submits that there is no need for a suggested modified schedule as one has not yet been entered because no Rule 26 conference has yet been held.

The reason for this brief adjournment request is that, at the time the parties entered into the current briefing schedule, your undersigned did not realize that the deadline to oppose would fall during the Passover holiday. This firm's staff observes the holiday and is therefore unable to file the opposition papers on Friday April 2, 2021. The Plaintiff therefore respectfully submits that there exists good cause to grant the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

Accordingly, this Court should grant the requested extension of time.

Respectfully submitted,

/s/ Leo Jacobs
Leo Jacobs, Esq.
Managing Partner
Jacobs PC

¹ It is respectfully requested that Your Honor disregard Docket No. 23 as it was filed in error.